UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001 03 MDL 1570 (GBD)(SN)

This document relates to:

Ber Barry Aron, et al. v. Islamic Republic of Iran, No. 1:20-cv-09376 (GBD) (SN)

MOTION TO SUBSTITUTE PARTIES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 15(d)

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the party as identified on Exhibit A in the above referenced action. The individual being substituted into the case is the Personal Representative of an individual killed as a result of the terrorist attacks on September 11, 2001 (a "9/11 decedent") or is the Personal Representative for a family member of a 9/11 decedent.

Exhibit A identifies the individuals to be substituted in the pleading, including the capacity in which they seek to be substituted, state of residency at the time the complaint was filed, the existing pleading that refers to the plaintiff, and the decedent of which the plaintiff is the Personal Representative.

Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, the substituted parties be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of the Court's Office and the size of this MDL.

Dated: January 4, 2022

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.
Bruce E. Strong, Esq.
Alexander Greene, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, NY 10020

Tel: (212) 278-1000 Fax: (212) 278-1733

Email: jgoldman@andersonkill.com bstrong@andersonkill.com agreene@andersonkill.com

EXHIBIT A to Aron Motion to Substitute Parties

	Previous Personal Representative:	Number:	Personal Representative:	State of Residency of Substituted Personal Representative at Filing:	
1	Louise Flickinger, individually, as surviving parent of Carl M. Flickinger		Lisa Madden as Personal Representative of the Estate of Louise Flickinger, deceased, the late parent of Carl M. Flickinger		Carl M. Flickinger